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MDL 1570 PLAINTIFFS' EXECUTIVE COMM

In re: Terrorist Attacks on September 11, 2001 (S.D.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

June 16, 2020

The Honorable Sarah Netburn
 Thurgood Marshall United States Courthouse
 40 Foley Square, Room 430
 New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") write, with the consent of the Department of Justice ("DOJ") and Federal Bureau of Investigation ("FBI"), to request a brief two-week further extension of the deadline for Plaintiffs' Reply in Support of their Second Motion to Compel Directed to the FBI and Opposition to the FBI's Cross-Motion for a Protective Order.

The brief further extension is needed to allow time for ongoing coordination activities among the PECs, and because the FBI served a supplemental production of documents on June 11, 2020 (the Eleventh Tranche). The PECs and their consultants are reviewing the Eleventh Tranche presently, and believe the content and timing of that production may be relevant to arguments Plaintiffs will be advancing in their brief.

For the foregoing reasons, the PECs respectfully request that the deadline for their reply and opposition brief be extended to July 2, 2020. Given vacation schedules, the DOJ and FBI have proposed that the parties meet and confer within one week after submission of Plaintiffs' brief, to discuss an appropriate deadline for the FBI's reply. Plaintiffs consent to that proposal.

Honorable Sarah Netburn
June 16, 2020

We thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

KREINDLER & KREINDLER LLP

By: /s/ Steven R. Pounian

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Andrew J. Maloney
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750 THIRTEENTH

MOTLEY RICE LLC

By: /s/ Robert T. Haefele

Robert T. Haefele
Motley Rice LLC
28 Bridgeside Boulevard
MAY 2020

The Court endorses the parties' request for a two-week extension for Plaintiffs' Reply and proposal to meet-and-confer to discuss a deadline for the FBI's Reply.

SO ORDERED.

June 17, 2020
New York, New York



SARAH NETBURN
United States Magistrate Judge

By: /s/ Sean P. Carter

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*On behalf of the MDL 1570 Plaintiffs' Exec.
Committees*